William F. Caton, Acting Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW, Room TW-325 Washington, DC 20554

Re: Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review - Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay service, North American Numbering Plan, Local Number Portability, and Universal Service Support; Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990; Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size; Number Resource Optimization; Telephone Number Portability; and Truth-in-Billing and Billing Format

CC Docket Nos. 96-45; 98-171; 90-571; 92-237; 99-200; 95-116; 98-170; and NSD File No. L-00-72

Dear Mr. Caton:

On March 28, 2002, Laura L. Smith, Donald J. Vasek, Ray Wisniewski, Ila Dudley, Karin Norton and Jeremy Denton of the Industrial Telecommunications Association, Inc. (ITA) held a brown bag luncheon at ITA's offices with Commissioner Kathleen Abernathy, Bryan Tramont and Kristina Tompkins to discuss the above-referenced *Further Notice of Proposed Rulemaking*. At the meeting, ITA addressed concerns that the proposed connection-based contribution mechanism may diminish the lines between intrastate and interstate carriers, while also possibly forcing non-interconnected, private wireless carriers to pay into universal service.

Sincerely,

/s/ Jeremy Denton
Jeremy Denton
Director, Government Affairs